

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

SUSAN HANSON,

Plaintiff,

v.

WENTWORTH-DOUGLASS HOSPITAL,

Defendant.

Civil Action No.

**NOTICE OF REMOVAL**  
**AND DEMAND FOR JURY TRIAL**

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§1441 and 1446, Defendant WENTWORTH-DOUGLASS HOSPITAL, by and through its attorneys, JACKSON LEWIS P.C., hereby removes this action from the Superior Court of the State of New Hampshire, Strafford County, to the United States District Court for the District of New Hampshire. In support of this Notice of Removal, Defendants states as follows:

1. By Complaint and Request for Jury Demand filed on or about November 21, 2017 in the Strafford County Superior Court, Plaintiff Susan Hanson instituted a claim against Defendant. A copy of the Summons in a Civil Action and Plaintiff's Complaint and Request for Jury Demand is attached hereto as Exhibit 1, a certified copy of which is to be forwarded upon receipt of the state court record from the Strafford County Superior Court.

2. This Court has original jurisdiction over this action by virtue of federal question jurisdiction pursuant to 28 U.S.C. §1331. Specifically, Plaintiff alleges disability discrimination/hostile environment, failure to accommodate and retaliatory termination, in

violation of the 42 U.S.C. §12101 et seq, and violation of the Family Medical Leave Act, 29 U.S.C. §§ 2601 et seq.

3. Pursuant to 28 U.S.C. §1446(a), this notice of removal is timely filed within thirty (30) days of December 7, 2017, the date on which counsel for Defendant first received a copy of the state court Complaint and Request for Jury Demand.

4. As this action could have been commenced in this Court, removal is proper. *See* 28 U.S.C. §1441(a). Furthermore, this Court may exercise supplemental jurisdiction over the Plaintiff's state law claims. *See* 28 U.S.C. §1367(a).

Respectfully Submitted,  
WENTWORTH-DOUGLASS HOSPITAL  
By its attorneys,  
JACKSON LEWIS P.C.,

Date: January 2, 2018

By: /s/ Martha Van Oot  
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Certificate of Service

I hereby certify that the foregoing was served via FedEx Overnight Mail on Kimberly T. Myers, Clerk, Strafford County Superior Court, 259 County Farm Road, Suite 301, Dover, NH 03820, and via Email and First Class Mail on counsel for Plaintiff, John Vanacore, Vanacore Law Office, LLC, 19 Washington Street, Concord, NH 03301, john@vanacorelaw.com and Leslie Johnson, Law Office of Leslie H. Johnson, PLLC, P.O. Box 265, Center Sandwich, NH 03227, leslie@lesliejohnson.com.

Date: January 2, 2018

/s/ Martha Van Oot  
Martha Van Oot